

In the United States District Court
For the Southern District of Georgia
Savannah Division

**Rebecca Brooks, Stuart Abel, III, James
Martin, III, and Nicole Martin,**

Plaintiffs,

v.

Thomas Mahoney III, in his official capacity as Chairman of the Chatham County Board of Elections, **Marianne Heimes**, in her official capacity as a Board Member of the Chatham County Board of Elections, **Malinda Hodge**, in her official capacity as a Board Member of the Chatham County Board of Elections, **Antwan Lang**, in his official capacity as a Board Member of the Chatham County Board of Elections, **Debbie Rauers**, in her official capacity as a Board Member of the Chatham County Board of Elections, **Samuel E. Tillman**, in his official capacity as the Chairman of the DeKalb County Board of Registrations and Elections, **Anthony Lewis**, in his official capacity as a Member of the DeKalb County Board of Registrations and Elections, **Susan Motter**, in her official capacity as a Member of the DeKalb County Board of Registrations and Elections, **Dele Lowman Smith**, in her official capacity as a Member of the DeKalb County Board of Registrations and Elections, **Becky Vu**, in her official capacity as a Member of the DeKalb County Board of Registrations and Elections, **Mary Carole Cooney**, in her official capacity as Chairperson of the Fulton County Registration and Elections Board, **Vernetta Keith Nuriddin**, in her official capacity as Vice Chair of the Fulton County Registration and Elections Board, **Kathleen Ruth**, in her official capacity as a

Case No.: _____

Declaration of James Bopp, Jr.

Member of the Fulton County Registration and Elections Board, **Aaron Johnson**, in his official capacity as a Member of the Fulton County Registration and Elections Board, **Mark Wingate**, in his official capacity as a Member of the Fulton County Registration and Elections Board, **Carol Wesley**, in her official capacity as Chair of the Clayton County Board of Elections and Registration, **Dorothy Foster Hall**, in her official capacity as Vice Chair of the Clayton County Board of Elections and Registration, **Patricia Pullar**, in her official capacity as a Member of the Clayton County Board of Elections and Registration, **Darlene Johnson**, in her official capacity as a Member of the Clayton County Board of Elections and Registration, **Diane Givens**, in her official capacity as the Secretary of the Clayton County Board of Elections and Registration, **John Mangano**, in his official capacity as Chairman of the Gwinnett County Board of Registrations and Elections, **Ben Satterfield**, in his official capacity as Vice Chairman of the Gwinnett County Board of Registrations and Elections, **Stephen W. Day**, in his official capacity as a Member of the Gwinnett County Board of Registrations and Elections, **Wandy Taylor**, in her official capacity as a Member of the Gwinnett County Board of Registrations and Elections, **Alice O'Lenick**, in her official capacity as a Member of the Gwinnett County Board of Registrations and Elections, **Phil Daniell**, in his official capacity as Chairman of the Cobb County Board of Elections and Registrations, **Fred Aiken**, in his official capacity as Vice Chairman of the Cobb County Board of Elections and Registrations, **Pat Gartland**, in his official capacity as a Member of the Cobb County Board of Elec-

tions and Registrations, **Jessica M Brooks**, in her official capacity as Secretary of the Cobb County Board of Elections and Registrations, **Darryl O. Wilson**, in his official capacity as Assistant Secretary of the Cobb County Board of Elections and Registrations, **Tim McFalls**, in his official capacity as Chairperson of the Augusta/Richmond County Board of Elections, **Sherry T. Barnes**, in her official capacity as Vice Chair of the Augusta/Richmond County Board of Elections, **Marcia Brown**, in her official capacity as Secretary of the Augusta/Richmond County Board of Elections, **Terence Dicks**, in his official capacity as a Board Member of the Augusta/Richmond County Board of Elections, **Bob Finnegan**, in his official capacity as a Board Member of the Augusta/Richmond County Board of Elections, **Donna Morris-McBride**, in her official capacity as Chair of the Henry County Board of Elections and Registrations, **Andy Callaway**, in his official capacity as Co-Chair of the Henry County Board of Elections and Registrations, **Arch Brown**, in his official capacity as a Board Member of the Henry County Board of Elections and Registrations, **Mildred Schmelz**, in her official capacity as a Board Member of the Henry County Board of Elections and Registrations, **Thomas Mahoney III**, in his official capacity as Chairman of the Chatham County Board of Elections, **Marianne Heimes**, in her official capacity as a Board Member of the Chatham County Board of Elections, **Malinda Hodge**, in her official capacity as a Board Member of the Chatham County Board of Elections, **Antwan Lang**, in his official capacity as a Board Member of the Chatham County Board of Elections, **Debbie Rauers**, in her official

capacity as a Board Member of the Chatham County Board of Elections, **Brad Raffensperger**, in his official capacity as Secretary of State of the State of Georgia, **Brian Kemp**, in his official capacity as Governor of the State of Georgia.

Defendants

Declaration of James Bopp, Jr.

I, James Bopp, Jr., make the following declaration pursuant to 28 U.S.C. § 1746:

1. I am the owner of The Bopp Law Firm, PC (“BLF”). I and my firm serve as lead counsel for the Plaintiffs in the above-captioned action. I am over the age of eighteen, and I have personal knowledge of the following facts. If called as a witness, I could and would competently testify thereto.

2. A true and accurate copy of the Law Officer Article, referenced in ¶ 35 of *Plaintiffs’ Verified Complaint for Declaratory and Injunctive Relief*, is attached hereto as Exhibit 1.

3. A true and accurate copy of the Judicial Watch Study, referenced in ¶ 41 of *Plaintiffs’ Verified Complaint for Declaratory and Injunctive Relief*, is attached hereto as Exhibit 2.

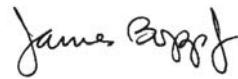
4. A true and accurate copy of the Just Facts Article, referenced in ¶ 42 of *Plaintiffs’ Verified Complaint for Declaratory and Injunctive Relief*, is attached hereto as Exhibit 3.

5. A true and accurate copy of the Wall Street Journal Article, referenced in ¶ 43 of *Plaintiffs’ Verified Complaint for Declaratory and Injunctive Relief*, is attached hereto as Exhibit 4.

6. A true and accurate copy of the National Pulse Article, referenced in ¶ 44 of *Plaintiffs’ Verified Complaint for Declaratory and Injunctive Relief*, is attached hereto as Exhibit 5.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed November 11, 2020

A handwritten signature in black ink that reads "James Bopp, Jr." in a cursive style.

James Bopp, Jr.

Date: November 11, 2020

Respectfully Submitted,

/s/ Ray Smith, III

Attorney Bar Number, GA 662555

SMITH & LISS, LLC

Five Concourse Parkway

Suite 2600

Atlanta, Georgia 30328

Telephone: 404-760-6000

E-Mail: rsmith@smithliss.com

Local Counsel for Plaintiffs

James Bopp, Jr.

Attorney Bar Number, IN 2838-84*

Lead Counsel for Plaintiffs

Melena S. Siebert

Attorney Bar Number, IN 35061-15*

True the Vote, Inc.

Validate the Vote Project

THE BOPP LAW FIRM, PC

1 South Sixth St.

Terre Haute, IN 47807-3510

Telephone: 812/232-2434

E-Mail: jboppjr@aol.com

** Pro Hac Vice forthcoming*

Certificate of Service

I hereby certify that on November 11, 2020, I caused the foregoing and all exhibits and attachments thereto in the above-captioned matter to be filed with the United States District Court for the Southern District of Georgia, Savannah Division, via the Court's CM/ECF system. I also hereby certify that I caused the foregoing and all exhibits and attachments thereto in the above-captioned matter to be served, via FedEx and email, with the appropriate Waiver of the Service of Summons forms, upon:

Chatham County, GA Board of Elections

Chatham County Board of Elections
1117 Eisenhower Dr., Ste. F
Savannah, GA 31406

Thomas Mahoney III, Chairman, tmahoney@tmahoneylaw.com;
Marianne Heimes, Board Member, mjheimes@aol.com;
Malinda Hodge, Board Member, hodgemelinda@aol.com;
Debbie Raders, Board Member, draders@aol.com;
Antwan Lang, Board Member
County Attorney: R. Jonathan Hart, Rjhart@chathamcounty.org
(Board of Elections did not have Mr. Antwan Lang's email on file; County Attorney R. Jonathan Hart was served via email)

DeKalb County Board of Registrations and Elections

DeKalb County Government Offices
1300 Commerce Dr.
Decatur, GA 30030

Anthony Lewis, Board Member, antlewis@dekalbcountyga.gov;
Susan Motter, Board Member, smotter@dekalbcountyga.gov;
Dele Lowman Smith, Board Member, dlsmith@dekalbcountyga.gov;
Samuel E. Tillman, Board Chair, setillman@dekalbcountyga.gov;
Becky Vu, Board Member, baokyvu@dekalbcountyga.gov;
County Attorney: Viviane H. Ernstes, vernstes@dekalbcountyga.gov

Certificate of Service (cont'd)

Fulton County Registration and Elections Board

Fulton County Government Address:

141 Pryor St. SW
Atlanta, GA 30303

Mary Carole Cooney, Chairperson, mccooney@mindspring.com;
Vernetta Keith Nuriddin, Vice Chair, vernettanuriddin@live.com
Kathleen Ruth, Member, drkayruth@icloud.com;
Aaron Johnson, Member, aaronvjohnson@yahoo.com;
Mark Wingate, Member wingate01md@gmail.com;
County Attorney: Patrise M. Perkins-Hooker patrise.perkins-hooker@fultoncountyga.gov

Clayton County, GA Board of Elections and Registration

Elections and Registration
Jonesboro Historical Courthouse - Main Floor
121 S. McDonough St.
Jonesboro, GA 30236

Carol Wesley, Chair ccwesley7@gmail.com;
Dorothy Foster Hall, Vice Chair, hallfosterd@hotmail.com;
Patricia Pullar, Member, pat.pullar@gmail.com;
Darlene Johnson, Member, ddgirl533@gmail.com;
Diane Givens, Secretary, dianegivens3@gmail.com;
County Attorney: Charles Reed, charles.reed@claytoncountyga.gov

Gwinnett County, GA Board of Registrations and Elections

Gwinnett Justice & Administration Center
75 Langley Dr.
Lawrenceville, GA 30046

John Mangano, Chairman, john.mangano@gwinnettcountry.com;
Ben Satterfield, Vice Chairman, ben.satterfield@gwinnettcountry.com;
Wandy Taylor, Member, wandy.taylor@gwinnettcountry.com;
Stephen W. Day, Member, stephen.day@gwinnettcountry.com;
Alice O'Lenick, Member, alice.olenick@gwinnettcountry.com;
County Attorney: Mike Ludwiczak, mike.ludwiczak@gwinnettcountry.com

Certificate of Service (cont'd)

Cobb County, GA Board of Elections and Registration

736 Whitlock Ave. NW, Ste. 400
Marietta, GA 30064

Phil Daniell, Chairman, Phil.Daniell@cobbcounty.org;
Fred Aiken, Vice Chairman, Fred.Aiken@cobbcounty.org;
Pat Gartland, Member, Pat.gartland@cobbcounty.org;
Jessica M Brooks, Secretary, Jessica.Brooks@cobbcounty.org;
Darryl O. Wilson, Assistant Secretary, Darryl.WilsonJR@cobbcounty.org;
County Attorney: H. William Rowling, Jr., H.William.Rowling@cobbcounty.org

Richmond County, GA Board of Elections

Richmond County Board of Elections
535 Telfair St., Ste. 500
Augusta, GA 30901

Tim McFalls, Chairperson
Sherry T. Barnes, Vice Chair
Marcia Brown, Secretary
Terence Dicks, Board Member
Bob Finnegan, Board Member

Individual Board Member email addresses not published; all filings sent to the Richmond County Attorney, Wayne Brown at: wbrown@augustaga.gov

Henry County, GA Board of Elections and Registration

Henry County Administration Building
140 Henry Pkwy.
McDonough, GA 30253

Donna Morris-McBride, Chair, dmcbride@co.henry.ga.us;
Andy Callaway, Co-Chair, ccallaway@co.henry.ga.us;
Arch Brown, Board Member, archbrown@co.henry.ga.us;
Mildred Schmelz, Board Member, mschmelz@co.henry.ga.us;
County Attorney: Patrick Jaugstetter (Jarrard & Davis, L.L.P.), patrickj@jarrard-davis.com

Certificate of Service (cont'd)

Secretary of State Brad Raffensperger – brad@sos.ga.gov and soscontact@sos.ga.gov
214 State Capitol
Atlanta, Georgia 30334

Governor Brian Kemp – brian.kemp@georgia.gov
206 Washington St., Ste. 203
State Capitol
Atlanta, GA 30334

Attorney General Chris Carr – ccarr@georgia.org and ccarr@law.ga.gov
40 Capitol Square, SW
Atlanta, GA 30334

/s/ Ray Smith, III
Ray Smith, III
Local Counsel for Plaintiffs